



**CT Corporation**  
**Service of Process Notification**

11/28/2023  
 CT Log Number 545228564

## Service of Process Transmittal Summary

**TO:** Laura Aznavoorian, Litigation Supervisor  
 Gallagher Bassett Services, Inc.  
 1901 S. Meyers Rd, Suite 200C  
 Oakbrook Terrace, IL 60181

**RE:** Process Served in Georgia

**FOR:** Costco Wholesale Corporation (Domestic State: WA)

### ENCLOSED ARE COPIES OF LEGAL PROCESS RECEIVED BY THE STATUTORY AGENT OF THE ABOVE COMPANY AS FOLLOWS:

**TITLE OF ACTION:** Re: BOK HEE HYUN AND YOUNG DO YOU // To: Costco Wholesale Corporation

**CASE #:** 23C08575S1

**NATURE OF ACTION:** Personal Injury - Failure to Maintain Premises in a Safe Condition

**PROCESS SERVED ON:** C T Corporation System, Lawrenceville, GA

**DATE/METHOD OF SERVICE:** By Process Server on 11/28/2023 at 12:44

**JURISDICTION SERVED:** Georgia

**ACTION ITEMS:** CT has retained the current log, Retain Date: 11/28/2023, Expected Purge Date: 12/13/2023

Image SOP

Email Notification, Laura Aznavoorian laura\_aznavoorian@gbtpa.com

Email Notification, Maureen Papier maureen\_papier@gbtpa.com

Email Notification, Derek Snead dsnead@costco.com

**REGISTERED AGENT CONTACT:** C T Corporation System  
 289 S. Culver St.  
 Lawrenceville, GA 30046  
 866-401-8252  
 SouthTeam2@wolterskluwer.com

The information contained in this Transmittal is provided by CT for quick reference only. It does not constitute a legal opinion, and should not otherwise be relied on, as to the nature of action, the amount of damages, the answer date, or any other information contained in the included documents. The recipient(s) of this form is responsible for reviewing and interpreting the included documents and taking appropriate action, including consulting with its legal and other advisors as necessary. CT disclaims all liability for the information contained in this form, including for any omissions or inaccuracies that may be contained therein.

**EXHIBIT**  
**A**



**PROCESS SERVER DELIVERY DETAILS**

**Date:** Tue, Nov 28, 2023  
**Server Name:** Drop Service

Entity Served	COSTCO WHOLESALE CORPORATION
Case Number	23-C-08575-S1
Jurisdiction	GA

Inserts		



CIVIL ACTION NO. 23-C-08575-S1☐ MAGISTRATE ☒ STATE ☐ SUPERIOR - COURT  
GWINNETT COUNTY, GEORGIADATE FILED 11/17/2023

ATTORNEY OR PLAINTIFF(S), ADDRESS &amp; TELEPHONE NUMBER

BOK HEE HYUNTAE K. SONGYOUNG DO YOU2550 PLEASANT HILL RD., SUITE 433

PLAINTIFF(S)

vs.

COSTCO WHOLESALE CORPORATIONDULUTH, GA 30096

DEFENDANT(S)

470-282-6264

NAME, ADDRESS &amp; TELEPHONE # OF PARTY TO BE SERVED

COSTCO WHOLESALE CORPORATION

GARNISHEE

THE CORPORATION COMPANY (FL)

Other attached documents to be served: \_\_\_\_\_

106 COLONY PARK DR., SUITE 800-BCUMMING, GA 30040

## SHERIFF'S ENTRY OF SERVICE

I HAVE THIS DAY SERVED THE WITHIN ACTION AND SUMMONS AS FOLLOWS:

☐ PERSONAL Upon the following named defendant:☐ NOTORIOUS Upon defendant \_\_\_\_\_  
By leaving a copy of the action and summons at the most notorious place of abode in the county.Delivered the same to \_\_\_\_\_ described as follows: approximate age \_\_\_\_\_  
yrs; approximate weight \_\_\_\_\_ pounds; approximate height \_\_\_\_\_ feet and \_\_\_\_\_ inches, domiciled at residence of the defendant.☒ CORPORATION Upon corporation The Corporation Company  
By serving Dayvon Jackson, in charge of the office and  
place of business of the corporation in this county.

By serving \_\_\_\_\_, its registered agent.

☐ TACK & MAIL By posting a copy of the same to the door of the premises designated in the affidavit and/or summons, and on the  
same day of such posting, by depositing a true copy of the same in the United States mail First Class mail, in an envelope properly  
addressed to the defendant(s) at the address shown in the summons, containing adequate notice to the defendant(s) to answer said  
summons at the place stated in the summons.☐ NON EST Did not serve because after a diligent search the defendant could not be found in the jurisdiction of the court.This 22 day of Nov, 2023.

SHERIFF DOCKET \_\_\_\_\_ PAGE \_\_\_\_\_

TIME: \_\_\_\_\_ M.

  
DEPUTY

IN THE STATE COURT OF GWINNETT COUNTY

STATE OF GEORGIA

**BOK HEE HYUN**

**YOUNG DO YOU**

23-C-08575-S1

CIVIL ACTION  
NUMBER: \_\_\_\_\_

PLAINTIFF

VS.

**COSTCO WHOLESALE CORPORATION**

DEFENDANT

**SUMMONS**

**TO THE ABOVE NAMED DEFENDANT:**

You are hereby summoned and required to file with the Clerk of said court and serve upon the Plaintiff's attorney, whose name and address is:

TAE K. SONG  
LAW OFFICE OF TAE K. SONG  
2550 PLEASANT HILL ROAD, SUITE 433, DULUTH, GA 30096  
470-282-6264

an answer to the complaint which is herewith served upon you, within 30 days after service of this summons upon you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint.

17th day of November, 2023

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ Tiana P. Garner

~~Richard T. Alexander, Jr.,~~  
Clerk of State Court

By \_\_\_\_\_

*M. A. Thomas*  
Deputy Clerk

INSTRUCTIONS: Attach addendum sheet for additional parties if needed, make notation on this sheet if addendum sheet is used.

## General Civil and Domestic Relations Case Filing Information Form

☐ Superior or ☒ State Court of Gwinnett County

For Clerk Use Only

23-C-08575-S1

Date Filed \_\_\_\_\_

Case Number \_\_\_\_\_

MM-DD-YYYY

## Plaintiff(s)

Hyun, Bok Hee

Last First Middle I. Suffix Prefix

You, Young Do

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

## Defendant(s)

Costco Wholesale Corporation

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Last First Middle I. Suffix Prefix

Plaintiff's Attorney \_\_\_\_\_ Bar Number \_\_\_\_\_ Self-Represented ☐

## Check One Case Type in One Box

## General Civil Cases

- ☐ Automobile Tort
- ☐ Civil Appeal
- ☐ Contract
- ☐ Garnishment
- ☒ General Tort
- ☐ Habeas Corpus
- ☐ Injunction/Mandamus/Other Writ
- ☐ Landlord/Tenant
- ☐ Medical Malpractice Tort
- ☐ Product Liability Tort
- ☐ Real Property
- ☐ Restraining Petition
- ☐ Other General Civil

## Domestic Relations Cases

- ☐ Adoption
- ☐ Dissolution/Divorce/Separate Maintenance
- ☐ Family Violence Petition
- ☐ Paternity/Legitimation
- ☐ Support – IV-D
- ☐ Support – Private (non-IV-D)
- ☐ Other Domestic Relations

## Post-Judgment – Check One Case Type

- ☐ Contempt
- ☐ Non-payment of child support, medical support, or alimony
- ☐ Modification
- ☐ Other/Administrative

- ☐ Check if the action is related to another action(s) pending or previously pending in this court involving some or all of the same parties, subject matter, or factual issues. If so, provide a case number for each.

Case Number \_\_\_\_\_

Case Number \_\_\_\_\_

- ☐ I hereby certify that the documents in this filing, including attachments and exhibits, satisfy the requirements for redaction of personal or confidential information in O.C.G.A. § 9-11-7.1.

- ☐ Is an interpreter needed in this case? If so, provide the language(s) required. \_\_\_\_\_  
Language(s) Required

- ☐ Do you or your client need any disability accommodations? If so, please describe the accommodation request.

**IN THE STATE COURT OF GWINNETT COUNTY  
STATE OF GEORGIA**

BOK HEE HYUN AND YOUNG DO YOU, )

Plaintiffs, )

v. )

COSTCO WHOLESALE CORPORATION, )

Defendant. )

CIVIL ACTION FILE NO.  
23-C-08575-S1**JURY TRIAL DEMANDED**

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**COMPLAINT**

COMES NOW, Plaintiffs, BOK HEE HYUN and YOUNG DO YOU, by and through their attorney, Law Office of Tae K. Song, as and for their Complaint for Personal Injuries and Damages against the Defendant COSTCO WHOLESALE CORPORATION, respectfully allege as follows:

**I. PARTIES, VENUE, JURISDICTION, AND SERVICE OF PROCESS**

1.

At all times hereinafter mentioned, Plaintiffs BOK HEE HYUN (hereinafter "HYUN") and YOUNG DO YOU (hereinafter "YOU") reside at 3058 Hartright Bend Ct., Duluth, Gwinnett County, Georgia 30096.

2.

At all times hereinafter mentioned, COSTCO WHOLESALE CORPORATION (hereinafter "COSTCO") is a foreign-profit corporation doing business in the State of Georgia with sufficient contacts to enable it to be sued herein.

3.

COSTCO may be served through its registered agent for service of process, The Corporation Company (FL), located at 106 Colony Park Dr. Ste 800-B, Cumming, GA, 30040 in Forsyth County as provided by law pursuant to O.C.G.A. § 14-2-504.

4.

Venue is proper in this Court, as this is a cause of action for negligence relating to an act or omission and/or substantial event that occurred at the property located in Gwinnett County. Therefore, subject to the jurisdiction and venue of this Court pursuant to Art. VI § II, Paragraph VI of the Georgia Constitution.

## **II. STATEMENT OF FACTS**

5.

On November 19, 2021, HYUN visited COSTCO in Duluth, GA.

6.

As HYUN passed by the electronics area, HYUN traumatically slipped on discarded strawberries and fell onto the ground. HYUN was pushing a shopping cart and slid under the cart as she slipped.

## **III. NEGLIGENCE**

7.

COSTCO was negligent in the ownership, operation, management, maintenance, and care of its warehouse in the following manner:

- i. Failure to keep its premises safe for those who are legally invited, induced, or led onto their property in violation of O.C.G.A. § 51-3-1.

- ii. Failure of duty of reasonable care.
- iii. Failure to exercise ordinary care in keeping the premises safe.
- iv. Failing to exercise ordinary diligence in violation of O.C.G.A. § 51-1-2.
- v. Failure of a legal duty owed to invitees of hazards that property owners had actual or constructive knowledge about.

8.

COSTCO's negligence was the direct and proximate cause of HYUN's injuries, resulting in the following medical expenses:

PROVIDER:	EXPENSES:
JJW Chiropractic Wellness Center	\$ 969.00
Pleasant Hill Family Medicine	TBA*
Northside Hospital	\$ 16,783.00
Gwinnett Emergency Specialists, PC	\$ 2,551.00
North Metropolitan Radiology	\$ 1,104.00
Barbour Orthopaedics and Sports Medicine	\$ 40,990.26
Fit in Motion Physical Therapy	\$ 26,760.00
Ankle and Foot Center of Georgia	\$ 440.00
MRI Imaging Specialist	\$ 3,780.00
<b>TOTAL BILLS TO DATE:</b>	<b>\$ 93,377.26*</b>

9.

COSTCO's negligence was the direct and proximate cause of HYUN's injuries, resulting in future medical care in the following medical expenses:

FUTURE MEDICAL CARE	EXPENSES:
Barbour Orthopaedics and Sports Medicine Surgical Estimate	\$ 71,770.20
Barbour Orthopaedics and Sports Medicine Facility Estimate	\$ 50,704.80
Northlake Anesthesia Professionals Surgical Estimate	TBA*
Barbour Orthopaedics and Sports Medicine F/U Visits Estimate	\$ 1,500.00
Physical Therapy Estimate	\$ 5,000.00



MRI Estimate Treatment in South Korea	\$ 3,780.00 TBA*
<b>TOTAL BILLS TO DATE:</b>	<b>\$ 132,755.00*</b>

#### **IV. PUNITIVE DAMAGES**

10.

Plaintiffs repeat, reiterate, and reallege each and every allegation contained in paragraphs “1” through “9” of their Complaint under the same force and effects as if fully set forth herein.

11.

Pursuant to O.C.G.A § 51-12-5.1, Defendants’ actions set forth above show, by clear and convincing evidence, malice, wantonness, or that entire want of care which raise the presumption of conscious indifference to consequences.

12.

Accordingly, in order to punish, penalize, and deter Defendants, they are liable to Plaintiff for punitive damages.

#### **V. LOSS OF CONSORTIUM**

13.

Plaintiffs repeat, reiterate, and reallege each and every allegation contained in paragraphs “1” through “12” of their Complaint under the same force and effects as if fully set forth herein.

14.

At all times hereinafter mentioned, YOU is the spouse of the injured HYUN.

15.

As a direct and proximate result of the aforementioned injuries sustained by HYUN, HYUN has been unable to perform the duties that she theretofore had performed for YOU. YOU

has further been deprived of the society, companionship, and consortium of HYUN, and YOU's comfort and happiness therein have been impaired, YOU is informed and believes that this deprivation and impairment will necessarily continue for an extended period of time, all to Plaintiffs damage in an amount to be determined upon the trial of this action.

15.

By reason of the foregoing, Plaintiffs are entitled to recover from Defendants compensatory and other damages in such amounts as may be shown by the evidence at trial and determined in the enlightened conscience of the jury.

**WHEREFORE**, PLAINTIFFS pray and respectfully demand verdict and judgment as follows:

- (a) That Summons and Complaint be filed and issued, and that process be issued according to law;
- (b) That Plaintiffs have judgment against Defendants for any and all damages allowed by law;
- (c) That Plaintiffs have judgment against Defendants for general damages and special damages to compensate Plaintiffs for all damages sustained, including past and present general and special damages and future damages;
- (d) That all costs of this action be cast against Defendants;
- (e) That Plaintiffs have judgment for pre-judgment and post-judgment interest pursuant to O.C.G.A. § 51-12-14 and O.C.G.A. § 7-4-12 as allowed by law;
- (f) That Plaintiff be awarded attorney fees and expenses of litigation pursuant to O.C.G.A. § 13-6-11, and as otherwise authorized by law; and
- (g) For such other and further relief as this Court deems just and proper.

This 17th day of November 2023.

Respectfully submitted,

**Law Office Tae K. Song**

A handwritten signature in dark ink, appearing to read 'Tae K. Song', is written over a horizontal line.

Tae. K Song

Georgia Bar No. 642332

Law Office of Tae K. Song

2550 Pleasant Hill Road

Suite 433

Duluth, GA 30096

*Attorney for Plaintiffs, Bok Hee Hyun and  
Young Do You*

IN THE STATE COURT OF GWINNETT COUNTY  
STATE OF GEORGIA

BOK HEE HYUN AND YOUNG DO YOU,	)	
	)	
Plaintiffs,	)	
	)	CIVIL ACTION FILE NO.
v.	)	
	)	
COSTCO WHOLESALE CORPORATION,	)	
	)	
Defendants.	)	JURY TRIAL DEMANDED
	)	

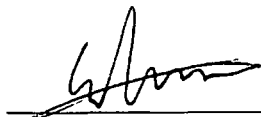
VERIFICATION

PERSONALLY APPEARED BEFORE ME, the undersigned officer authorized to administer oaths, BOK HEE HYUN and YOUNG DO YOU, who after having been duly sworn, on oath, depose and state that the facts contained in the foregoing COMPLAINT are true and correct.

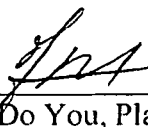
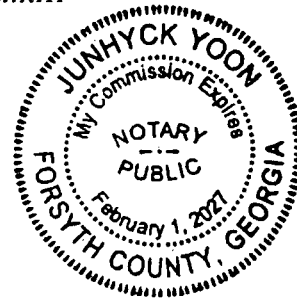


Bok Hee Hyun, Plaintiff

Sworn to and subscribed before me  
This 17th day of November, 2023.

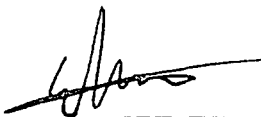


Notary Public  
My Commission Expires: February 1, 2024



Young Do You, Plaintiff

Sworn to and subscribed before me  
This 17th day of November, 2023.



Notary Public  
My Commission Expires: February 1, 2024

